

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

UNITED STATES OF AMERICA

V.

JOSHUA HEATH ZUNIGA

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CRIMINAL NO. 5:06-MJ-055

RENEWED MOTION TO ALTER CONDITIONS OF RELEASE

1. One of the defendant's release conditions is that he not use the computer.
2. Mr. Zuniga, along with his family members, is in the process of purchasing a gift/stationary business. The business consists of two stores.
3. In order to effectively set up and run the business, Mr. Zuniga needs permission to access the computer to set up programs like Quickbooks in order to track inventory and to do payroll.
4. Mr. Zuniga promises not to use the computer to send e-mails and/or to visit the World Wide Web.
5. Mr. Zuniga hereby requests permission to use the computer solely for business purposes.
6. Undersigned could not reach AUSA Suchy by the time this motion was prepared.

WHEREFORE, it is respectfully requested that this Honorable Court grant the relief requested above.

Dated: August 21, 2006

Respectfully submitted,

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BY: /s/ MARK EIGLARSH
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BY: /s/ DANIEL W. HURLEY

CERTIFICATE OF SERVICE

I certify that on August 21, 2006, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

Steve Sucsy
Assistant U. S. Attorney
1205 Texas Avenue, Suite 700
Lubbock, Texas 79401

/s/ MARK EIGLARSH

CERTIFICATE OF CONFERENCE

I certify that I conferred with Steve Sucsy, the Assistant U.S. Attorney assigned to this matter, regarding the filing of the foregoing and he has stated that he is going to defer to the Court and to the probation office.

/s/ MARK EIGLARSH
Attorney for Defendant